

FEB 10 2016

JULIA C. DUDLEY, CLERK
BY: *[Signature]*
DEPUTY CLERK

FORM TO BE USED BY PLAINTIFFS IN FILING A COMPLAINT
UNDER THE EQUAL EMPLOYMENT OPPORTUNITY ACT, 42 U.S.C. Chapter 21,
Subchapter VI

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

RONETTA W. JONES,

Plaintiff,

v.

BEST BUY

Defendant(s).

(Enter the full name(s) of ALL parties in this lawsuit.
Please attach additional sheets if necessary).

Civil Action No.: 0:16CV00004
(To be assigned by Clerk of District Court)

COMPLAINT

1. State the full name of the Plaintiff, address and telephone number.

Name: RONETTA WEBSTER JONES

Address: 6217 PAWNEE DRIVE, LYNCHBURG VA. 24502

Telephone Number: 434-237-1682

2. List all Defendants. State the full name of the Defendant, even if that Defendant is a government agency, an organization, a corporation, or an individual. Include the address where each Defendant may be served. Make sure that the Defendant(s) listed below are identical to those contained in the above caption of the complaint.

- a. Defendant No. 1

Name: BEST BUY
% CT CORPORATION SYSTEM

Address: 4701 COX ROAD, SUITE 285

GLEN ALLEN, VIRGINIA

23060

b. Defendant No. 2

Name: _____

Address: _____

NOTE: IF THERE ARE ADDITIONAL DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.c., 2.d., etc.).

3. On what day were you discharged from employment or otherwise affected by the alleged unlawful employment practice(s) of the defendant(s) above?

FEBRUARY 2014 ?

4. On what day was your complaint filed with the Equal Employment Opportunities Commission?

NOVEMBER 2013

5. What action did the Commission or its representatives take in regard to your complaint?

CASE CLOSED

6. If no action was taken or if your complaint was dismissed by the Commission, did you receive notice from the Commission within 180 days of the date listed in 4. above, of your right to bring a civil action to correct the alleged unlawful employment practice(s)?

NO - DID NOT RECEIVE LETTER TO SUE UNTIL
NOVEMBER 2015

7. If the answer to 6. is yes, has 90 days passed since your receipt of the notice described in 6.?

N/A

8. Has any action been brought in any state court or in any other federal court concerning the alleged unlawful employment practice(s) of the above defendant(s)?

NO

If your answer to 8. is yes, describe the action in the spaces below.

a. Parties to the action:

b. Court (if federal court, give district; if state court, name the city or county):

N

c. Docket Number: _____

d. Judge's Name: _____

A

e. Is the case still pending: _____ If not, what was the ruling? _____

Was the case appealed? _____

If more than one action has been filed, please provide this information on a separate sheet of paper and label this information as paragraph 8.f., etc. Check here if additional sheets of paper are attached: ☐

9. Are there any state or local agencies presently making active efforts to obtain a voluntary end to the alleged unlawful employment practice?

☐ Yes

☒ No

☐ I DON'T KNOW

If yes, please describe which agencies are involved and whether their efforts are being undertaken on your behalf?

On the remainder of this form, please answer the questions relating to your problems with the defendant(s) and, if necessary, include additional sheets of paper in order to fully explain the facts beyond your complaint.

A. What was or is your employer? BEST BUR

- B. What individuals were involved in your discharge or other unlawful practice about which you are complaining? (Also explain what position each individual held, what that individual did that affected you, and about which you are complaining?)

STORE MANAGER AARON BECAME MANAGER AT BLUE BUFF.
I WORKED WITH AARON FOR SEVERAL MONTHS WITH NO COMPLAINT ABOUT MY JOB PERFORMANCE. AFTER SOMETIME EMPLOYEES OF COLORED RACE WERE BEING TERMINATED OR OVER-LOOK FOR ADVANCED EMPLOYMENT IN STORE. SOME JOBS WERE BEING OFFERING WITHOUT BEING POSTED. A POSITION WAS MADE AVAILABLE IN INVENTORY THAT WAS NOT AVAILABLE TO ANOTHER NEW-HIRE. SHE WAS SENT FOR TRAINING AS A SWAT (WHICH IS MY JOB TITLE). THEN BECAME ISSUE OF ME NOT PERFORMING AS I SHOULD IN WHICH OUR STORE WAS THE ONLY STORE TO MAKE OUR PHYSICAL INVENTORY GOAL AND I RECEIVED A PAY RAISE AT ANNUAL REVIEW.

- C. If you were fired, what reasons were given for your discharge?

VIOLATING COMPANY POLICY (TIME EDIT)

If you disagree with those reasons, what do you think were the real reasons?

I HAVE EDIT MY TIME CARD ON NUMEROUS OCCASSIONS DUE TO MANAGEMENT ARRIVING TO WORK LATE. I FEEL IT WAS RETALIATION FROM FILING PREVIOUS COMPLAINT WITH EEOC IN NOVEMBER 2013.

- D. Does your employer have a grievance procedure to use when employees are unhappy about actions taken against them? YES

- E. If so, did you file a grievance with your employer?

YES

If you did, what action was taken? I CALLED HUMAN RESOURCES ABOUT DISCRIMINATION IN THE WORK PLACE & UNFAIR TREATMENT OF EMPLOYEES

F. In the space below (and on additional sheets of paper, if necessary), please state any other facts which you consider important in this complaint.

I HAD BEEN EMPLOYED AT BEST BUY FOR ABOUT 6 YRS.
I HAVE EMAIL AND OTHER DOCUMENTATIONS PROVING
I HAVE BEEN DOING MY JOB DESCRIPTION AND
BEYOND WHAT WAS REQUIRED OF ME AS SWAT.
I FOUND MULTIPLE DISCREPANCIES IN MERCHANDISE
WE WERE SUPPOSE TO RECEIVE BUT WAS SHORTENED.
I HAVE DOCUMENTS SHOWING MY TIME EDITS FROM
PREVIOUS DAY OF MANAGEMENT BEING LATE. I ALSO
HAD APPROXIMATELY FIFTY HOURS VACATION, NINE
HRS. SICK TIME, AND NINETEEN HOURS PERSONAL TIME.
MANAGER AARON AND BRITNEY BUSSETT NEVER
Held A CONVERSATION WITH ME ASKING ME TO EXPLAIN
MY TIME EDIT. THE TIME WE HAD ANY CONVERSATION
ABOUT THIS THEY WERE PLACING ME ON SUSPENSION
UNTIL HUMAN RESOURCES CONTACT ME. HUMAN RESOURCE
NEVER MADE ANY ATTEMPTS TO CONTACT ME. BY HOME
PHONE OR CELL PHONE. (SEE ATTACHMENTS FOR ADDITIONAL
INFORMATION)

G. If you were fired, have you been working since that time? NO

2 SHEETS

If yes, for whom have you worked? N/A

What did you do? N/A

If you did not get another job, have you received unemployment compensation? YES

If yes, for how long?

H. What relief do you want from this court? For example: COMPENSATION FOR
Do you want your job back? TERMINATION AND
EMOTIONAL DISTRESS

Have you suffered any damages? YES

If so, how much? _____

OTHER:

I HAVE NOT BEEN ABLE TO FIND EMPLOYMENT BECAUSE
OF BEING TERMINATED FROM BEST BUY. MY CHILD HAD
TO GET OUT OF COLLEGE BECAUSE OF FINANCIAL HANDSHIP.

Attach additional sheets of paper as necessary and label this information as paragraph I.,
etc. Check here if additional sheets of paper are attached. ☒

Signature of Plaintiff M. R. Roney Jr.

VERIFICATION

State of _____

County of _____

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this _____ day of _____, _____.

Signature of Plaintiff _____

(I.)
THIS ISSUE STARTED WHEN SHARON LUCADO WAS HIRED ON WITH NO OPENING POSITIONS FOR INVENTORY. THERE IS ONLY ONE PERSON THAT HAS THE JOB TITLE AS SWAT / INVENTORY SPECIALIST. MS. LUCADO WAS SENT OFF FOR TRAINING AS SWAT. I HAVE BEEN EMPLOYED AT THAT TIME FOR APPROXIMATELY SIX YEARS AT BEST BUY. I HAD NEVER BEEN SENT FOR ANY TYPE OF TRAINING. UPON MS. LUCADO'S RETURN AARON THEN STARTED HAVING ISSUES WITH MY JOB PERFORMANCE. I RECEIVED A "WRITE UP" ABOUT MY JOB PERFORMANCE AND EXPLAINED AT THAT POINT THROUGH VARIOUS EMAIL THAT OTHER EMPLOYEES WERE NOT RELEASING AND PROCESSING ORDERS CORRECTLY. I SAW WHERE THIS WAS LEADING TO SO I CONTACTED HUMAN RESOURCES. I MADE ATTEMPTS BEFORE THIS TO SPEAK TO DISTRICT MANAGERS ABOUT UNFAIR AGES IN THE WORK PLACE TO NO AVAIL. A DAY OR TWO LATER I RECEIVED ANOTHER "WRITE UP" AND THATS WHEN I CONTACTED EQUAL EMPLOYMENT (OVER) COMMISSION. AFTER CONTACTING EEOC THEY USED MY

TIME EDIT AS REASON FOR RETALIATION. I OBTAINED
INFORMATION ABOUT OTHER EMPLOYEES THAT EDIT (J.)
THEIR TIME CARDS AS WELL BUT WERE NOT TERMINATED.
THE DAY IN QUESTION WERE A WITNESS BY THE
NAME OF KEVIN SADLER WHO SAW I WAS IN MY
CAR WITH MY WINDOWS ROLLED UP BECAUSE IT WAS
RAINING. MANAGER BRITTANY BURSETT WAS LATE
WHICH SHE HAS BEEN ON NUMEROUS OCCASSIONS AND
THIS CAN BE VALIDATED BY THE SECURITY COMPANY
LINKED TO THE BUILDING. AT NIGHT AN ALARM HAD
TO BE SET UPON LEAVING THE BUILDING. IN THE
MORNING WHEN YOU COME IN THE ALARM HAD TO BE
SHUT OFF BY ENTERING A CODE. THE SECURITY COMPANY
WILL HAVE THE TIME OF BRITTANY BURSETT COMING
INTO BUILDING. THE TERMINATION OF MY EMPLOYMENT
WAS IN RETALIATION FOR CALLING EEOC. I ALSO
HAVE PAST AND PRESENT EMPLOYEES OF BEST BUY
THAT WILLING TO STAND AS WITNESSES.

Donna Rousso